

To the Federal Communications Commission:

The Women's Venture Fund, a not-for-profit organization that targets women entrepreneurs in under-served urban communities submits these comments regarding a proceeding to examine cable a la carte, (MB Docket No. 04-207.) As an organization strongly committed to opportunity for women, the Women's Venture Fund understands how American media provides information that positively affects women's lives. Increased access and exposure to media provides valuable information, offers educational opportunity, promotes positive images of women, and helps them to better understand how to make informed decisions about their future and the future of America. For this reason we strongly support greater diversity in media ownership, employment and programming.

We understand that the instant proceeding is intended to inform the Commission's examination of cable a la carte, a proposal that would permit consumers to buy cable channels individually rather than in bundles. The Women's Venture Fund believes that the proposal could have a significant negative impact on the so-called "niche" networks that cater to particular interests or demographics such as women, minorities, gays and lesbians, and non-English language speakers. As the record in this proceeding reveals, these programmers view cable a la carte as an extreme threat to their survival. They believe that it would undermine existing multicultural networks, erect a substantial barrier to entry for new networks and erode media diversity.¹

Niche networks that cater to women and other targeted audiences already have a very difficult time getting distribution on cable. A la carte would only exacerbate this problem and make it more difficult for these channels to attract advertisers or subscribers. If a la carte is enacted, there would be less diversity and fewer channels devoted to women and minorities. As a recent GAO report concluded, "some cable networks, especially the small and independent networks would not be able to gain enough subscribers to support the network."²

As an organization with a longstanding commitment to women's empowerment, opportunity, and equality, we urge the FCC to heed the concerns expressed by multicultural programmers and civil rights groups regarding the impact of cable a la carte on media diversity and to recommend to Congress that it not be enacted.³ The FCC should continue to give consumers more choice and control and retain diversity in programming. It should encourage diversity in the number of women and minority owners, executives and employees in the cable industry.

Respectfully Submitted,

Maria Otero
Founder and President
Women's Venture Fund
240 West 35 Street
New York, NY 10001

¹ See, for example, the letter to the House Energy and Commerce Committee signed by the chief executives of BET Holdings, TV One, the International Channel, and Si TV.

² Report to the Chairman, Committee on Commerce, Science, and Transportation, U.S. Senate: "Issues Related to Competition and Subscriber Rates in the Cable Television Industry." United States General Accounting Office. Report 04-8: October 2003.

³ Organizations that have expressed concerns about the impact of a la carte on diversity in letters to Congress include the NAACP, the Minority Media and Telecommunications Council, and the National Asian Pacific American Legal Consortium and the Black Caucus.